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Attorneys for Defendants SACRAMENTO-
VALLEY LIMITED PARTNERSHIP, d/b/a
VERIZON WIRELESS and GUILLIAM NEL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

MONICA EISENSTECKEN, et al.,

Plaintiffs,

vs.

TAHOE REGIONAL PLANNING AGENCY, et
al.,

Defendants.

Case No. 2:20-cv-02349-TLN-CKD

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT AND EXCEED PAGE
LIMITS**

Filed: November 24, 2020

Trial Date: None Set

Plaintiffs Monica Eisenstecken, Tahoe Stewards, LLC, Tahoe for Safer Tech, and
Environmental Health Trust, and Defendants Tahoe Regional Planning Agency, Joanne
Marchetta, in her official and individual capacities, Marsha Berkbigler, in her official and
individual capacities, Sue Novasel, in her official and representative capacities, Guillian Nel,
Tahoe Prosperity Center, Inc., and Sacramento Valley Limited Partnership, doing business as

Verizon Wireless (“Verizon Wireless”), collectively, the “Stipulating Parties,” stipulate as follows:

1. The Plaintiffs filed their Petition for Writ of Mandate and Complaint for Declaratory Relief and on November 24, 2020 (Dkt. 1) and their Amended Petition for Writ of Mandate and Complaint for Declaratory Relief on December 10, 2020 (Dkt. 5) (the “Amended Complaint”).

2. The Defendants have waived service of the Amended Complaint, and absent an extension, the latest date for the Defendants to respond to the Amended Complaint would be February 16, 2021.

3. The Defendants need a fifteen (15) day extension of time to respond to the Amended Complaint given the number of parties and complexity of this case, and such extension is acceptable to Plaintiffs. This is the first such extension requested by any Defendant.

4. In addition, Defendants intend to file one or more motions to dismiss the Amended Complaint. Due to the length and complexity of the complaint, which contains 13 causes of action, the Stipulating Parties believe that briefs in support of and opposition to the motion(s) to dismiss will require more pages than the Court’s standing order would normally permit. In order to allow adequate presentation of the issues, the Stipulating Parties request that the Court allow up to 25 pages for any motion to dismiss or opposition, and up to 15 pages for reply briefs in support of any motion to dismiss.

IT IS SO STIPULATED.

Dated: February 12, 2021

/s/ Mark S. Pollock
MARK S. POLLOCK
Attorney for Plaintiffs
MONICA EISENSTECKEN, TAHOE
STEWARDS, LLC, TAHOE FOR SAFER TECH,
and ENVIRONMENTAL HEALTH TRUST

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2
3 /s/ John L. Marshall_____
4 JOHN L. MARSHALL
5 Attorney for Defendants
6 TAHOE REGIONAL PLANNING AGENCY,
7 JOANNE MARCHETTA, MARSHA
8 BERKBIGLER, and SUE NOVASEL

9
10 REMY MOOSE MANLEY LLP

11 /s/ Howard Wilkins, III_____
12 HOWARD WILKINS III
13 Attorneys for Defendant
14 TAHOE PROSPERITY CENTER, INC.

15 MACKENZIE & ALBRITTON LLP

16 /s/ James A. Heard

17 _____
18 JAMES A. HEARD
19 Attorneys for Defendants
20 SACRAMENTO VALLEY LIMITED
21 PARTNERSHIP, d/b/a VERIZON WIRELESS and
22 GUILLIAM NEL

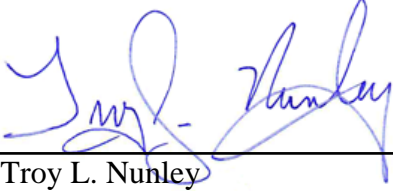
23 **ORDER**

24 Pursuant to stipulation of the parties, and good cause being shown, it is hereby ORDERED and
25 ADJUDGED that:

- 26 1. Defendants shall have until March 3, 2021, to respond to the Amended Complaint; and
27 2. For any motion to dismiss the Amended Complaint, the following page limits shall apply:
28 25 pages for opening and opposition briefs, and 15 pages for reply briefs.

IT IS SO ORDERED.

Dated: February 12, 2021

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Troy L. Nunley
United States District Judge